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8 **UNITED STATES DISTRICT COURT**

9

10 **DISTRICT OF NEVADA**

11 TERI P. VILLAFANA,

Case No. 2:21-cv-00661-GMN-DJA

12 Plaintiff,

13 v.
14 T-MOBILE USA, INC., a foreign Corporation
15 licensed to do business in Nevada,
16 Defendant.

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO FILE A
RESPONSIVE PLEADING TO
DEFENDANT'S MOTION TO DISMISS
[FIRST REQUEST]**

17 Pursuant to LR IA 6-1 and LR 7-1, Plaintiff TERI P. VILLAFANA (“Plaintiff”) and
18 Defendant T-MOBILE USA, INC. (“Defendant”) by and through their undersigned counsel, hereby
19 agree and stipulate to extend the time for Plaintiff to file a responsive pleading to Defendant’s
20 Motion to Dismiss (ECF No. 25) from the current deadline of October 8, 2021, up to and including
21 **October 15, 2021.**

22 Defendant previously filed a motion to dismiss Plaintiff’s Complaint. ECF No. 8. In
23 response to Defendant’s Motion, Plaintiff filed a First Amended Complaint which contains
24 amended claims and facts. ECF No. 19. Defendant filed a second Motion to Dismiss. ECF
25 No. 25. Plaintiff requests this extension because it is necessary in order for Plaintiff’s counsel to
26 investigate the allegations set forth in the Motion to Dismiss, including coordination with
27 bankruptcy counsel and the bankruptcy trustee, and prepare a sufficient responsive pleading.

1 Additionally, Defense counsel will be out of town during the new reply time frame so the
2 Parties further stipulate that Defendant's reply brief would be due up to and including **October 27,**
3 **2021.**

4 This is the first request for an extension of time to respond to the Motion to Dismiss ECG
5 No. 25. This request is made in good faith and not for the purpose of delay.

6 Dated: October 7, 2021

Dated: October 7, 2021

7 Respectfully submitted,

Respectfully submitted,

9 /S/ Mary F Chapman

10 MARY F. CHAPMAN, ESQ.
LAW OFFICE OF MARY F. CHAPMAN,
LTD.

11 *Attorney for Plaintiff*
TERI P. VILLAFANA

/S/ Amy L. Thompson

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AMY L. THOMPSON, ESQ.
LITTLER MENDELSON, P.C.

12 *Attorneys for Defendant*
T-MOBILE USA, INC.

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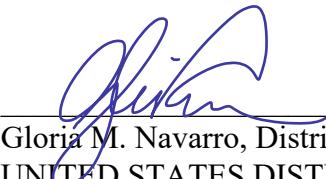
14 **IT IS SO ORDERED.**

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16 Dated this 8 day of October, 2021.

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19 
Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT